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*Attorney for Defendants
Marc Baier, Ryan Adams, and Daniel Gericke*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

**LOUJAIN HATHLOUL
ALHATHLOUL,**

Plaintiff,

vs.

**DARKMATTER GROUP,
MARC BAIER, RYAN ADAMS, and
DANIEL GERICKE,**

Defendants.

No. 3:21-cv-01787-IM

**JOINT UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS DARKMATTER GROUP,
MARC BAIER, RYAN ADAMS, AND
DANIEL GERICKE TO ANSWER AND/OR
OTHERWISE RESPOND TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

LOCAL RULE 7-1 CERTIFICATION

The undersigned counsel certify that counsel for Defendant DarkMatter and counsel for the Individual Defendants have conferred with Plaintiff's counsel, and Plaintiff does not oppose this motion.

JOINT MOTION

Defendants DarkMatter Group ("DarkMatter"), Marc Baier, Ryan Adams, and Daniel Gericke, ("Individual Defendants," and collectively, "Defendants") by and through their undersigned counsel, hereby submit this Joint Unopposed Motion for Extension of Time to Answer and/or Otherwise Respond to Plaintiff's Complaint. Defendants seek an extension up to and including July 10 to answer and/or otherwise respond to Plaintiff's First Amended Complaint. The current deadline for Defendants to file their Answer is May 22, 2023.

Good cause exists because Plaintiff recently filed a 52-page First Amended Complaint with a number of additional facts. Defendants, who are all overseas, need to coordinate with counsel on two coasts to respond to the First Amended Complaint. The current deadline under the Rules would pose substantial strain on counsel, who are all working on a variety of other matters. It should further be noted that there are three national holidays over the forthcoming weeks, in addition to a major holiday in the United Arab Emirates, all of which further impacts counsel's ability to prepare a response.

Defendants respectfully request that the Court grant this unopposed motion to extend the time up to and including July 10, 2023, for Defendants DarkMatter, Marc Baier, Ryan Adams, and Daniel Gericke to answer and/or otherwise respond to Plaintiff's First Amended Complaint. This request is made in good faith and not for purposes of delay.

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Dated this 11th day of May, 2023.

Respectfully submitted,

SNELL & WILMER L.L.P.

SCHWABE, WILLIAMSON & WYATT, P.C.

s/ Clifford S. Davidson (by permission)

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s/ Nika Aldrich

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